

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF THE SEARCHES OF: )

LG CELLULAR PHONE )  
SERIAL NUMBER 409CYDG399202 )  
(PHONE NUMBER 828-201-0023) )

Magistrate No. 15.0402M  
[UNDER SEAL]

CRICKET ZTE CELLULAR PHONE )  
MODEL Z987, SERIAL NUMBER 327B50050EE5 )  
(PHONE NUMBER 412-613-6478) )

Magistrate No. 15.0401M  
[UNDER SEAL]

**AFFIDAVIT IN SUPPORT OF APPLICATIONS UNDER RULE 41 FOR  
WARRANTS TO SEARCH AND SEIZE**

I, Denise V. Holtz, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I, Denise V. Holtz, make this affidavit in support of applications under Rule 41 of the Federal Rules of Criminal Procedure for warrants to search the following portable electronic devices; one **LG Cellular Phone (S/N: 409CYDG399202), phone number 828-201-0023**, and one **Cricket ZTE Cellular Phone (MODEL Z987, S/N: 327B50050EE5), phone number 412-613-6478 (hereinafter "the SUBJECT DEVICES")**, and to extract from said devices all electronically stored information as described in Attachment B, which constitutes evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 1591 and 1594, and Title 21, United States Code, Section 841(a)(1) and 846.

2. The SUBJECT DEVICES were seized by the Pennsylvania State Police (PSP) on February 17, 2015, and have since been transferred to the Federal Bureau of Investigation (FBI) – Pittsburgh, Evidence Custodian, 3311 East Carson Street, Pittsburgh, Pennsylvania 15203. They have remained in secure law enforcement custody at all relevant times. Based on my training and experience, I know that the **SUBJECT DEVICES** have been stored in a manner in

which their contents are, to the extent material to this investigation, in substantially the same state as they were when the **SUBJECT DEVICES** first came into the possession of the PSP and the FBI.

3. Since this affidavit is being submitted for the limited purpose of securing search warrants, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that the devices described above were used in committing and containing evidence of violations of Title 18, United States Code, Sections 1591 and 1594, and Title 21, United States Code, Sections 841(a)(1) and 846. I have not omitted any facts which would negate probable cause.

4. Your affiant is a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice. I have worked in this position since August 1997. I am currently assigned to the Pittsburgh Field Office of the FBI and I am assigned to the Civil Rights Squad. I am a member of the Western Pennsylvania Human Trafficking Coalition, which is comprised of federal, state and local law enforcement, and its primary investigative focus is Sex Trafficking of minors. I am presently assigned to handle violent crimes, including offenses involving sex trafficking of children, in violation of Title 18, United States Code, Sections 1591 and 1594; enticing minors to engage in prostitution, in violation of Title 18, United States Code, Section 2422(b); as well as offenses involving transportation for purposes of prostitution, in violation of Title 18, United States Code, Section 2421. Prior to being assigned to the Civil Rights Squad, I was assigned to the Violent Crime Squad with my primary investigative responsibilities focusing on Crimes Against Children. During this time (approximately ten years), I was the Crimes Against Children Coordinator for the Pittsburgh Field Office and participated in numerous investigations involving Production of Child Pornography, Possession

of Child Pornography, Kidnapping, and the Mann Act. I have gained experience through training at the FBI Academy, various conferences involving crimes against children and human trafficking, and everyday work related to conducting these types of investigations. I am also empowered by law to conduct investigations and to make arrests for offenses enumerated in Section 2516 of Title 18 of the United States Code. I am a law enforcement officer with authority to obtain and execute federal warrants.

5. The information in this Affidavit is based on my own investigation and my discussions with Corporal Douglas Howell of the Pennsylvania State Police in Harrisburg, Pennsylvania, concerning his investigation. I have reviewed Corporal Howell's reports and other documentation in support of this Affidavit.

**APPLICABLE STATUTES AND DEFINITIONS**

6. This investigation concerns alleged violations of Title 18, United States Code, Sections 1591 and 1594, relating to the sex trafficking of minors.

7. Title 18, United States Code, Section 1591 reads, in relevant part:

(a) Whoever knowingly;

1) in or affecting interstate or foreign commerce....recruits, entices, harbors, transports, provides, obtains, or maintains by any means a person; or

2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1),

knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion ..., or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as described in subsection

(b).

8. Title 18, United States Code, Section 1594 provides, in relevant part:

(c) Whoever conspires with another to violate section 1591 shall be fined under this title, imprisoned for any term of years or life, or both.

9. Pursuant to Title 18, United States Code, Section 1591(e)(3), commercial sex act is defined as “any sex act, on account of which anything of value is given to or received by any person.”

10. This investigation also concerns investigations of persons who engage in drug trafficking offenses, in violation of 21 U.S.C. §§ 841 (a) (1) and 846 among others.

**BACKGROUND AND TERMS RELATING TO SEX TRAFFICKING  
AND USE OF CELLULAR PHONES**

11. Based on my training and experience in these investigations as well as consultation with others involved in sex trafficking, I know that:

a. Many individuals involved in the commercial sex trade are known as pimps and prostitutes. A pimp is a person who participates in the business of commercial sex by supervising prostitutes and collecting the proceeds of commercial sex acts, while a prostitute is anyone who provides sexual services in exchange for money or other items of value. These individuals frequently advertise prostitution services on the internet by using computers and other digital media devices that connect to the internet to post advertisements on websites such as www.Backpage.com (hereinafter “Backpage”). Backpage is an advertising website that offers a wide variety of classified listings. In addition to traditional classified listings, Backpage also has a section dedicated to “adult entertainment” services. This section of Backpage is commonly used to advertise sexual services. The use of Backpage in the advertisement of prostitution services showed a significant increase after a similar website, Craigslist, removed their adult

services section in 2010. Though officially prohibited from listing illegal services such as prostitution, users circumvent the system by using coded language in such online advertisements.

b. These advertisements frequently contain nude, semi-nude, and/or provocative photographs of the individuals being advertised. These advertisements almost always contain prices for services, and language which denotes the type of services which are available, in a coded or abbreviated language. These services are typically advertised by type of service or length of time.

c. Pimps commonly take the photographs for the prostitution advertisements on cameras, cellular telephones, iPods, iPads, and other electronic devices. These photographs can then be uploaded directly to the internet, or transferred to another electronic medium.

d. A “Bottom Girl” is the street term for a woman who sits atop the hierarchy of prostitutes working for a particular pimp. A bottom girl is usually the prostitute who has been with the pimp the longest and consistently makes the most money. Being the bottom girl gives the prostitute status and power over the other women working for the pimp; however, the bottom girl also bears many responsibilities. (See United States v. Pipkins, 378 F.3d 1281 (11th Cir. 2004), in which the Eleventh Circuit described the bottom girl’s duties as “work[ing] the track in [her pimp’s] stead, running interference for and collecting money from the pimp’s other prostitutes, [and] look[ing] after the pimp’s affairs if the pimp was out of town, incarcerated, or otherwise unavailable.”).

e. “Johns/Clients” are the customers of prostitutes. The slang term is used among both prostitutes and law enforcement to identify persons who solicit prostitutes.

f. A “Date/Trick/Play” is a street term that has dual meaning. It can be used to identify a person who solicits a prostitute, making it synonymous with the term “John or



Client.” It is also used to describe a sexual encounter between a prostitute and a john/client. The latter is the context in which “date” is used for the purposes of this affidavit.

g. “Post” is a term used to describe the act of creating and placing an advertisement on an adult or erotic website to attract johns/clients for commercial sex acts.

h. “Outcall Service” is a term used to describe the act of an escort or prostitute going TO the john/client’s location for commercial sex acts.

i. “In-call Service” is a term used to describe the act of a john/client going to the location of the escort or prostitute for the purpose of engaging in a commercial sex act.

12. Based on the experience and training of your Affiant regarding investigations into pimp controlled prostitution and sex trafficking, it is known that cellular phones are utilized by pimp/traffickers to recruit and direct their victims. This is done through both voice and text methods. A pimp will maintain complete control of their victims and cell phones are often utilized to facilitate this control. A pimp may call or text their victim every hour throughout the day and night to make sure that they are following directions or the "rules" the pimp has established. A pimp will direct his victims as to when and where they need to be to "service" a client.

13. Pimps commonly maintain telephone numbers, addresses and directions in computer databases, books and papers. Pimps commonly maintain telephone numbers and other information related to the business in mobile telephones. Almost all communication between a pimp and prostitute, while she is working, is conducted by mobile telephone. To control her use of the mobile telephone the pimp often purchases phones, or prepaid phone cards, for his prostitutes to use. Computers and mobile telephones are also commonly used and as such hold evidence of the illegal operation such as: photographs, calendars, addresses, customer lists,

advertisements and financial records. The presence of child pornography is often observed on digital media including computers, cameras, cellular phones and thumb drives, due to the photographing and videotaping of underage prostitutes in a sexually explicit manner.

14. Cellular phones are also the most common means for a pimp to schedule "dates" with clients. Pimps will provide cellular phone numbers on advertisements they post on internet sites such as Backpage. A potential john/client will contact the phone number posted on the advertisement in order to schedule a "date" with the girl posted on the advertisement. Once the date is arranged, the pimp will use their cell phones to make sure the victim is ready for the date and provide details on where and when the date is to take place.

15. Cellular telephones store voice mail messages, names, telephone numbers, addresses, sent and received text messages, and images on their digital memory. This information is crucial in establishing the relationship between a pimp and victim of sex trafficking. Further, pimps frequently use the "bottom girl," to assist with scheduling and management of a prostitution enterprise, and will often maintain contact with the "bottom girl" via cellular phone.

**BACKGROUND AND TERMS RELATED TO DRUG TRAFFICKING  
AND USE OF CELLULAR PHONES**

16. I am aware that evidence of drug crimes can often be found in electronic media, including in cellular telephones. Such evidence can be found in various locations in a cellular telephone, such as in text messages, contact lists indicating the names and numbers of associates, call logs indicating calls made to and received from associates, online search history files, and photograph and video gallery files, among other things. It should be noted that, with the advancement of technology, the distinction between computers and cellular telephones is quickly

becoming less clear. Actions such as internet searching or emailing, in addition to calling and text messaging and photographing, can now be performed from many cell phones.

17. In addition, those involved in drug trafficking crimes commonly communicate using multiple cellular telephones. Contemporaneous possession of multiple cellular telephones is, therefore, evidence of such trafficking. Moreover, the particular numbers of, and the particular numbers dialed by, particular cellular telephones can be evidence of drug trafficking, particularly in light of the fact that it is a practical necessity that drug traffickers communicate with each other, as well as with their customers and suppliers, by telephone. Such numbers can confirm identities of particular associates and the occurrence of certain events.

18. I am aware that drug traffickers sometimes take “trophy” photographs and videos using their cellular telephones of their drugs, firearms, and proceeds and retain them on their cellular telephones. I am also aware that such traffickers, like law-abiding citizens, sometimes take photographs and videos using their cellular telephones of themselves with their friends, relatives, and associates and keep the photographs on their cellular telephones. When they are taken or retained by drug traffickers, such photographs and videos can be evidence, and can lead to additional evidence of such illegal trafficking activity by identifying the traffickers, contraband, and people who are actively assisting and/or supporting the trafficking activity as well as the locations where they live or where they store their drugs, proceeds, or paraphernalia.

**BACKGROUND REGARDING CAPABILITIES AND SEARCHES OF  
CELLULAR TELEPHONES**

19. A wireless telephone (or mobile telephone, cellular telephone, or smart phone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional “land line” telephones. A cellular phone usually contains



a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, cellular phones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic “address books;” sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Cellular phone may also include global positioning system (“GPS”) technology for determining the location of the device. Due to the structure of the radio signals utilized by cellular telephones, connections between such devices often cross state and international borders, even when the devices communicating with each other are in the same state. Conduct affecting interstate commerce has been found to include the use of cellular phones to engage in prostitution (see United States v. Daniels, 685, F.3d 1237 (11th Cir. 2012); United States v. Sutcliffe, 505 F.3d 944 (9th Cir. 2007)).

20. As stated above, cellular telephones or smart phones are capable of storing voice mail messages, names, telephone numbers, addresses, sent and received text messages, and images on their digital memory. Based on my knowledge, training, and experience, I know that these electronic devices can store such information for long periods of time. Similarly, if a cellular or smart phone is used to access the Internet, the Internet pages that were viewed on the cellular phone are typically stored for some period of time on the device. This information can sometimes be recovered through forensic analysis.

21. A thorough search of electronic devices such as cellular phones for evidence of instrumentalities of a crime commonly requires a qualified expert to conduct the search in a laboratory or other controlled environment. This is true for the following reasons:

- a. Searching electronic devices is a highly technical process which requires specific expertise and specialized equipment. There are so many types of electronic devices in use today that it is impossible to bring to the search site all of the necessary technical manuals and specialized equipment necessary to conduct a thorough search. In addition, it may also be necessary to consult with personnel who have specific expertise in the type of digital media that is being searched.
- b. Searching digital media requires the use of precise, scientific procedures which are designed to maintain the integrity of the evidence and to recover "hidden," erased, compressed, encrypted, or password protected data. Since such data is particularly vulnerable to inadvertent or intentional modification or destruction, a controlled environment, such as a law enforcement laboratory, is essential in conducting a complete and accurate analysis of the equipment and storage devices from which the data will be extracted.

### **PROBABLE CAUSE**

22. On February 17, 2015, during a routine traffic stop on Interstate 81, in Lower Paxton Township, Dauphin County, the Pennsylvania State Police identified four juvenile females with two adults. During a consent search of the vehicle, 80 bricks of heroin were located. At that time, the adult occupants of the vehicle were arrested. The juveniles were placed in juvenile protective custody. The driver of the vehicle was Roneice Norfleet and the passenger in the front seat of the car was Robert Middlebrook. In plain view, in the front seat console in the vehicle and seized incident to the arrest, were four cellular telephones. Two of the cellular telephones belonged to Norfleet. Norfleet gave the FBI consent to search her telephones. The four juveniles also gave the FBI consent to search their cellular phones located

in their personal belongings. Middlebrook identified that remaining two cellular phones, the **SUBJECT DEVICES**, as his phones, but did not provide consent to search his cellular phones at the time of arrest.

23. Middlebrook waived his Miranda warnings and agreed to be interviewed relative to the heroin. He stated that he was provided \$10,000 by a man named "Jeff" to obtain heroin in New Jersey, and bring it back to "Jeff" in Pittsburgh. He stated that he arrived in Patterson, New Jersey, provided the money to a woman named Carolyn, and received the heroin in return. He also indicated that as he was being pulled over by police, he had called "Jeff" and informed him of the traffic stop.

24. On this same date, the four juveniles were interviewed by law enforcement and advised that they were from the Akron/Canton Ohio area and met Middlebrook approximately 2 weeks earlier. The juveniles advised that all four of them were friends and one of the juveniles had met Middlebrook in January 2015 and Middlebrook had invited her to visit him in Pittsburgh. That juvenile then convinced her friends to come to Pittsburgh with her. All four of the juveniles were runaways. The juveniles reported that Middlebrook communicated with the juveniles by text message while he was in Pittsburgh and they were in Ohio. They were told by Middlebrook that he would bring them to Pittsburgh to shop and have fun with their friends. On or about February 9, 2015, Middlebrook drove to Ohio to bring two of the juveniles to Pittsburgh. Each of the juveniles reported that she had told Middlebrook her actual age and that she was a juvenile. While in Pittsburgh, one of the juveniles reported having sexual contact with Middlebrook. On or about February 11, 2015, Middlebrook again drove to Ohio and picked up the other two juveniles and drove them to Pittsburgh. Each of these two juveniles also told Middlebrook that they were minors. Middlebrook also had sexual contact with one of those two

juveniles once in Pittsburgh.

25. The juveniles reported that in Pittsburgh, Pennsylvania, they were informed by Middlebrook that they were required to prostitute to earn money for him. Advertisements were placed on Backpage for the prostitution of these four girls. These advertisements were placed on Backpage utilizing cellular telephones and were paid for with prepaid credit cards provided by Middlebrook to the juveniles.

26. The pictures of the girls that were posted on Backpage were taken by Middlebrook and another adult female named Kiari Day, a.k.a. Nikki. The four juveniles reported that they believed Day to be the "bottom girl" working for Middlebrook. These pictures were taken on cellular telephones and iPads. Middlebrook provided lingerie for the juveniles to wear for their advertisements. Middlebrook and Day also provided the juveniles with drugs, such as marijuana and Molly, while in Pittsburgh.

27. Middlebrook took the four juveniles to the Econolodge Motel located at 1303 Clairton Boulevard, Jefferson Hills, Pennsylvania on or about February 11, 2015. Middlebrook purchased the room with cash and told the juveniles that he would not take them back to Ohio until they did what he wanted. Middlebrook also threatened the juveniles that he would pay someone to have them killed. The juveniles reported that they were afraid of Middlebrook. Middlebrook left the four juveniles in the hotel for several days without adequate food. The juveniles texted his cellular phone, one of the **SUBJECT DEVICES**, while they were in the hotel and requested food and that he come get them and take them back to Ohio.

28. On February 15, 2015, Middlebrook moved the juveniles to another motel for the purposes of prostitution. Middlebrook booked a room at the South Hills Motel in his name and paid for the room with cash. The juveniles were placed in the room and instructed to respond to

prostitution ads at the behest of Middlebrook. All proceeds of the prostitution were required to be ultimately given to Middlebrook.

29. During the time the juveniles were in Pittsburgh with Middlebrook, they communicated extensively with Middlebrook via cellular telephones regarding the prostitution, the “plays”, the hotels they were staying in, the fact they wanted to go home, and the fact that they were hungry and without food and felt trapped in Pittsburgh.

30. The cellular phones belonging to the juveniles have been analyzed by the FBI forensics agents upon consent. These phones revealed text message communications with Middlebrook utilizing the SUBJECT DEVICES, videos of Middlebrook and his home, and discussions of their prostitution for Middlebrook. One discussion concerns the fact that Middlebrook did not like one of the juveniles (referred to as “your sis”) because she was not earning money for him. The following are excerpts from text messages between one of the juveniles and Middlebrook:

On 2/13/2015, the juvenile sent Middlebrook a text stating “OMG im so irritated I can’t keep sittin in this fuck room. How u was on yo way but now she is and she aint even here I cant be in t his fuckin room I got a whole fuckin attitude Bobby for real when is we leavinh”

On 2/13/2015, the juvenile sent Middlebrook a text stating “Because im tired of sittin in this fuckin room. You been saying u was comin all day like wtf. We been here all night and day. Where fuckin hungry like come on u slippin bro”

On 2/13/2015, the juvenile sent Middlebrook a text stating “You. Im pissed I benn in this room. All fucking day wtf and u been lying to me all day u would feel the same way”

On 2/13/2015, the juvenile sent Middlebrook a text stating” So how tf u goin to get weed and we fuckin stuck in this room.

On 02/15/2015, the juvenile sent Middlebrook a text stating “Bobby get a card so we can post”



On 02/16/2015, the juvenile sent Middlebrook a text stating "U just really changed up on me my feelings is hurt and now u treating them bitches good like yall just been rocking. U took me away from all the mistreatment and disrespect I was goin thru and turned round and did the same thing"

On 02/16/2015, Middlebrook (828-201-0023) sent the juvenile a text stating "Yup no doubt and all i told you was i didnt want your sis not you around i dont like your sis and i told you that"

On 02/16/2015, the juvenile sent Middlebrook at text stating "Ok but wtf would u even have started fuckin wit me anyway. When we meet u said i got u no matter wat happen wat we go thru i got u. Yu lied to me when i bought them hoes round u looked at me different like wtf if i knew this was gone happen i would have never bought nobody it would have been us but u wanted this bobby"

On 02/16/2015, Middlebrook sent the juvenile a text stating "No i want the money fuck hoes do you really think i cant get hoes"

On 02/16/2015, Middlebrook sent the juvenile a text stating "I told you last night in the car i dont like here and you went off not me im trying to get paid"

On 02/16/2015, Middlebrook sent the juvenile a text stating "Your other friends and you gave me money your sis aint do shit give up shit you can stay but im a trying to make money so wassup and we need some more girls cuz you don't want no money"

On 02/16/2015, Middlebrook sent the juvenile a text stating "They going home but you cant do all the work we need more girls we taking 3 back we need at least one more"

31. On or about February 16, 2015, Middlebrook told the juveniles that he and Norfleet (the driver) were taking them back to Ohio. He provided the juveniles with marijuana during the ride and they fell asleep. When they woke up, they realized that they were not in Ohio as promised but in New Jersey. They stayed in the car while Middlebrook and Norfleet went into a house and returned with a bag. The juveniles did not know what was in the bag and were scared that they were not in Ohio. On the way back from New Jersey, the vehicle was stopped by the Pennsylvania State Police.

32. The cellular phones seized from Middlebrook's vehicle were logged in as evidence with the Pennsylvania State Police at the time of Middlebrook's arrest, and were later transferred into the custody of the FBI. This evidence has been maintained at all times in secure law enforcement custody since they were seized.

33. During subsequent investigation by the Pennsylvania State Police, a search warrant was conducted of Middlebrook's residence which identified the background in the Backpage advertisements as being consistent with Middlebrook's residence. Female clothing and a wig that were in the Backpage advertisements were also seized from Middlebrook's residence.

34. Middlebrook was charged in Dauphin County, Pennsylvania on February 17, 2015 with Trafficking of Minors, Conspiracy to Possess with the Intent to Distribute Heroin, and Possession with the Intent to Distribute Heroin. Middlebrook failed to appear at a Preliminary Hearing on that case and his whereabouts are unknown at present.

#### **SEARCH METHODOLOGY TO BE EMPLOYED**

35. The search procedure of electronic data contained in hardware, software, and/or memory storage devices of the cellular phones listed in Attachment A may include the following techniques (the following is a non-exclusive list, as other search procedures may be used):

- a. examination of all of the data contained in such computer hardware, computer software, and/or memory storage devices to view the data and determine whether that data falls within the items to be seized as set forth herein;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth herein;
- c. surveying various files directories and the individual files they contain;

- d. opening files in order to determine their contents;
- e. scanning storage areas;
- f. performing key word searches through all electronic storage areas to determine whether occurrences of language contained in such storage areas exist that are likely to appear in the evidence described in Attachment B; and/or
- g. performing any other data analysis technique that may be necessary to locate and retrieve the evidence described in Attachment B.

### **CONCLUSION**

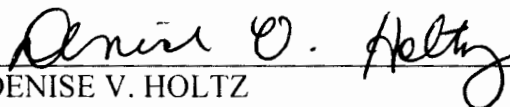
36. Based upon the information above, I have probable cause to believe that violations of Title 18, United States Code, Sections 1591 and 1594, and Title 21, United States Code, Sections 841(a)(1) and 846, have been committed, and that the items described in Attachment B, which are evidence, fruits, and instrumentalities of those violations, will be found in the items described in Attachment A.

37. By this affidavit, I request that the Court issue warrants authorizing the searches of the following electronic devices: **1. LG Cellular Phone (S/N: 409CYDG399202), phone number 828-201-0023; and 2. Cricket ZTE Cellular Phone (MODEL Z987, S/N: 327B50050EE5), phone number 412-613-6478.**

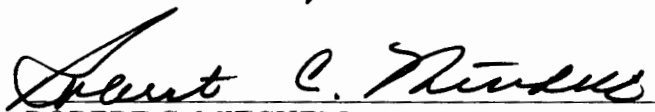
38. Because this warrant seeks only permission to examine a device already in law enforcement's possession, the execution of this warrant does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

39. Additionally, your affiant respectfully requests that the Court issue an order sealing, until further order of Court, all papers submitted in support of this application, including

the application and search warrant. I believe that sealing the documents is necessary because they relate to an ongoing investigation, and not all of the targets of this investigation have yet been arrested or indicted. Additionally, this affidavit contains sensitive information. Your affiant submits that premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

  
DENISE V. HOLTZ  
Special Agent  
Federal Bureau of Investigation

Sworn and Subscribed to Before Me  
This 30<sup>th</sup> Day of April, 2015.

  
ROBERT C. MITCHELL  
United States Magistrate Judge

**ATTACHMENT A**

**ITEMS TO BE SEARCHED**

- 1. LG Cellular Phone (S/N: 409CYDG399202), phone number 828-201-0023;**
- 2. Cricket ZTE Cellular Phone (MODEL Z987, S/N: 327B50050EE5), phone number 412-613-6478**

These device(s) are currently logged in as evidence with the Federal Bureau of Investigation – Pittsburgh, Evidence Custodian, 3311 East Carson Street, Pittsburgh, Pennsylvania 15203.

This warrant authorizes the forensic examination of these devices for the purpose of identifying the electronically stored information described in Attachment B.



**ATTACHMENT B**

**ITEMS TO BE SEIZED**

The following materials which constitute evidence of the commission of a criminal offense, contraband, the fruits of crime, or property designed or intended for use or which is or has been used as the means of committing a criminal offense, namely violations of Title 18, United States Code, Sections 1591 and 1594, and Title 21, United States Code, Sections 841(a)(1) and 846.

1. Email accounts/messages/user information containing information regarding sex trafficking, prostitution, and production of child pornography.
2. All visual depictions of juveniles engaging in sexually explicit conduct, and visual depictions taken for the purpose of advertising prostitution services.
3. Social networking information regarding sex trafficking and prostitution.
4. Any and all lists of names, telephone numbers, and addresses related to the operation of sex trafficking/prostitution services.
5. Any and all records, showing dominion, ownership, custody, or control over the electronic device.
6. Information regarding user accounts for Erotic/Prostitution advertisements on Backpage, Craigslist, and other "erotic/escort service" websites.
7. Logs, ledgers, and contact information for clients of sex trafficking/prostitution services.
8. Contact/identifying information for victims of sex trafficking and production of child pornography.
9. Any other information stored related to prostitution, sex trafficking and production of child pornography.
10. Records and information relating to a conspiracy to force or coerce the victims into acts described by Title 18, United States Code, Section 1591.

11. Records and information relating to an access of the SUBJECT DEVICES by Middlebrook.
12. Records and information relating to the identity or location of Middlebrook.
13. Records and information relating to the posting of the ads on www.Backpage.com.
14. Evidence of the times the SUBJECT DEVICES were used.
15. Passwords, encryption keys, and other access devices that may be necessary to access the SUBJECT DEVICES.
16. Records of or information about the SUBJECT DEVICES's Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.
17. Incoming/outgoing call log and associated numbers.
18. Incoming/outgoing text messages (a/k/a short message systems).
19. Incoming/outgoing e-mails.
20. Incoming/outgoing voice messages.
21. Photographs.
22. Any/all other electronic media stored data inside the search locations utilized for communication and data saving purposes, as well as documents relating thereto.